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12 Attorneys for *Defendant*
13 THE REPUBLIC OF ARGENTINA

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT

17 NML CAPITAL, LTD.,

18 Plaintiff,

19 vs.

20 SPACE EXPLORATION
21 TECHNOLOGIES CORP., aka
SPACEX, a Delaware corporation;
22 THE REPUBLIC OF ARGENTINA, a
foreign state, including its *COMISIÓN*
NACIONAL DE ACTIVIDADES
ESPAZIALES, aka CONAE, a political
23 subdivision of the Argentine State; and
DOES 1-10,

24 Defendants.

25 No. 14 CV 02262-SVW-Ex

26 [Hon. Stephen V. Wilson]

27 **DECLARATION OF DONALD R.
BROWN**

28 [Filed concurrently with
(1) Not. of Mot. and Mot. to Dismiss,
and (2) Declaration of Conrado F.
Varotto]

Hearing Date: June 30, 2014

Time: 1:30 p.m.

Courtroom: 6

Compl. filed: March 25, 2014

1 **DECLARATION OF DONALD R. BROWN**

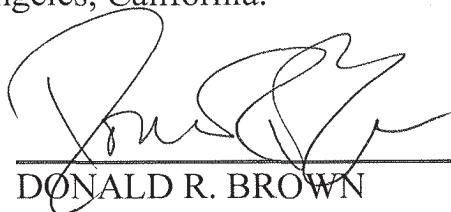
2 I, Donald R. Brown, declare as follows:

3 1. I am an attorney at law duly licensed to practice before this
4 Court and all courts of the State of California. I am a partner in the law firm of
5 Manatt, Phelps & Phillips, LLP, attorneys of record for defendant the Republic of
6 Argentina. I have personal knowledge of the facts set forth herein, and if called to
7 testify, I could and would competently testify to those matters.

8 2. Attached as Exhibit A is a copy of an unpublished decision by
9 the Supreme Court of the State of New York, Commercial Division, Westchester
10 County, in *Brant Point, Ltd. v. The Republic of Congo*, No. 4238/04. The decision
11 is dated December 12, 2006.

12
13 I declare under penalty of perjury under the laws of the United States
14 of America that the foregoing is true and correct.

15 Executed on May 15, 2014, in Los Angeles, California.

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DONALD R. BROWN